



309B Macleod Trail SW  
High River, Alberta Canada T1V 1Z5  
P: 403.652.2110 F: 403.652.2396  
[www.highriver.ca](http://www.highriver.ca)

October 12, 2022

Attention: Jordon Copping  
Calgary Metropolitan Region Board  
Suite 305, 602 11 Ave. SW  
Calgary, AB  
T1R 1J8  
[jcopping@calgarymetroregion.ca](mailto:jcopping@calgarymetroregion.ca)

**EMAILED ONLY**

**RE: Town of High River comments on REF Application 2022-08 (Foothills County)**

Dear Mr. Copping,

Thank you for providing the Town of High River with the opportunity to comment on REF Application 2022-08 (Foothills County).

The Town of High River would like to raise several concerns with the proposed Area Structure Plan in terms of servicing feasibility, sequencing (prior to the Context Study), and alignment with the Calgary Metropolitan Region Growth Plan.

**A. Servicing Feasibility**

The Town of High River has reviewed the 2022-08 ASP submission as well as the associated Water and Sanitary Strategy dated July 27, 2022, by K2 Engineering Ltd.

The Town notes that an Engagement Summary was included in the submission that details the steps the County undertook to engage the Town while creating the subject ASP. As the County reports, in 2020, the Town's key concerns included the County's decision to delay undertaking a detailed servicing study and allowing piecemeal development to proceed. The County further confirms that the Town provided comments in 2021, noting concerns about approving an ASP prior to completing a functional servicing report. The Engagement Summary also notes that the Town continued to have concerns about the lack of a servicing study in March 2022. The submitted Water and Sanitary Strategy does not address the Town's concerns as it is not a comprehensive functional servicing report.

The Town specifically has concerns about the interim servicing option for water. According to the Town of High River Sustainable Water Resources Management Plan (2014, Worley Parsons) and supplementary information requests (2015, Worley Parsons), based on the aquifer test completed, the values of hydraulic conductivity estimated from the aquifer tests are very low for sand and gravel; therefore, this aquifer may have a low potential to store and deliver significant yields. An assumption was made that there were relatively low yield wells in the area. It was recommended that additional tests be conducted to confirm prior to review of this ASP or refute this hypothesis.

The Town is also concerned about the apparent lack of mechanism in place to regulate growth in advance of the infrastructure being built. Specifically, it appears that there is no mechanism in place to trigger when the water and wastewater treatment plants are to be completed, but rather all of Phase 1 appears to be allowed to be developed in lieu of servicing. While the Town does

acknowledge that the ASP indicates that piped servicing must be in place prior to commencing the development of Phase 2, the Town continues to have concerns about Phase 1 of the development proceeding without a functional servicing report.

It was noted in the subject submission that the Town does not wish to service this development. That comment is based on the fact that the Town of High River has other existing servicing commitments and we do not have adequate information at this time to prove that servicing the subject ASP area would be sustainable. The Town cannot provide additional water without further licensing and further research into the long-term sustainability of the aquifer.

The Town believes that the servicing information provided as part of the subject submission was conceptual and further details would be required for the Town to have confidence in the plan. The Town respectively continues to believe that a full functional servicing report should be required, along with the other studies that typically accompany an ASP (including but not necessarily limited to noise, traffic, environmental, geotechnical, servicing, and archeological studies, considering that this ASP is within a Preferred Growth Area.

#### ***B. Sequencing (prior the Context Study)***

The Town believes that it is premature to support an Area Structure Plan within a Joint Planning Area prior to the Context Study, considering that a functional servicing report was not included in the subject submission.

Section 3.1.9.4 of the GP lists the elements that should be included in the Context Study. These items include a servicing strategy for water, wastewater and stormwater; and sequencing of developments, including strategies to ensure that development occurs in an orderly manner, maximizing the efficiency of servicing.

The Town of High River would not necessarily be opposed to allowing ASP's to be approved within JPA#4 prior to the Context Study being in place had there been a functional servicing report as part of the submission. However, in lieu of a functional servicing report, the Town believes that it would be premature to support an Area Structure Plan within the JPA prior to the Context Study as the Context Study will help to provide guidance on servicing for the entire JPA area.

#### ***C. Alignment with the Calgary Metropolitan Region Growth Plan (GP)***

In its letter to Foothills County dated March 17, 2022, the Town reiterates its concern that “the implementation of this ASP without the required servicing study could result in development that is not consistent with the [Growth Plan] and / or facilitate non-sustainable development within our region.”

The proposed Foothills Crossing ASP is within Joint Planning Area (JPA) #4. JPA's, according to Section 3.1.9 of the GP, “will accommodate growth in Preferred Placetypes, which have been shown to result in lower environmental, economic, and social impacts.” To achieve this level of sustainability, the Town questions how it is prudent to allow an ASP to be approved without a functional servicing strategy.

Please do not hesitate to contact the undersigned should you have any further questions or concerns.

Regards,

A handwritten signature in black ink, appearing to read "Chris Prosser". The signature is written in a cursive, flowing style.

Chris Prosser  
*Chief Administrative Officer*